



United States Department of Justice

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April 9, 2024

By ECF

Hon. Robert E. Littlefield, Jr.
United States Bankruptcy Judge
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

RE: In re Kris Daniel Roglieri, Case No. 24-10157 (REL)

Dear Judge Littlefield:

On behalf of the United States Attorney's Office for the Northern District of New York, I write regarding Your Honor's April 4, 2024 order (Dkt. # 104) requesting the appearance of my colleagues, Criminal Division Assistant United States Attorneys Michael Barnett and Joshua R. Rosenthal, at tomorrow morning's hearing. It appears that their presence was requested because debtor's motion (Dkt. # 65) implied that debtor and this Office have reached an "arrangement" that requires Court approval. To be clear, I have been informed that this Office has *not* agreed to any such arrangement, nor will it do so. The arrangement proposed by the debtor in his motion seeks to supplant asset forfeiture law and procedure with an authorization to immediately sell the subject property. The United States Attorney's Office will not agree to such an arrangement and will proceed under the procedures and deadlines established by asset forfeiture law, which govern the seizures at issue here. Accordingly, the United States Attorney's Office does not believe there is a reason for an attorney from this Office to attend tomorrow's hearing.

We apologize for the late filing of this letter, but my colleagues did not receive notice of the Court's order until earlier today.

Respectfully submitted,

CARLA B. FREEDMAN
United States Attorney

By: /s/ Cathleen B. Clark
Cathleen B. Clark
Assistant United States Attorney
Bar Roll No. 516792

cc: Counsel of Record (by ECF)